

1 THE HONORABLE JOHN C. COUGHENOUR
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9 UNITED STATES DISTRICT COURT
10 FOR THE WESTERN DISTRICT OF WASHINGTON
11 AT SEATTLE

12 IN RE VALVE ANTITRUST LITIGATION

13 No. 2:21-cv-00563-JCC

14 **STIPULATION AND (PROPOSED)
15 ORDER ADDING COVERED ENTITY
16 TO STIPULATED SUPPLEMENTAL
17 PROTECTIVE ORDER (DKT. 135)**

18 **NOTE ON MOTION CALENDAR:
19 NOVEMBER 8, 2023**

20 WHEREAS, the protections set forth in the Stipulated Protective Order (“Protective
21 Order”) in the above-captioned case (“Litigation”), *see* Dkt. No. 95, apply and are available to
22 non-parties as well as parties;

23 WHEREAS, Plaintiffs and Defendants (together, the “Parties”) have served subpoenas
24 on non-party Walmart, Inc. (“Walmart”) that seek certain documents and information relating
25 to Plaintiffs’ claims and Defendant’s defenses;

STIPULATED ORDER ADDING COVERED ENTITY TO
STIPULATED SUPPLEMENTAL PROTECTIVE ORDER – 1

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1 WHEREAS, on September 25, 2023, the Parties entered a Stipulated Supplemental
2 Protective Order that granted additional protections to non-parties Electronic Arts, Inc.,
3 Nintendo of America Inc., and Ubisoft, Inc. (collectively, the “Requesting Companies”), prior
4 to the Requesting Companies disclosing their confidential information in this matter, *see* Dkt.
5 No. 134 (“Supplemental Protective Order”);
6

7 WHEREAS, the Court entered the Supplemental Protective Order on September 26,
8 2023, *see* Dkt. No. 135; and

9 WHEREAS, prior to the disclosure of its confidential information in this matter,
10 Walmart has requested the protections set forth in the Supplemental Protective Order.

11 WHEREFORE, IT IS HEREBY ORDERED that the provisions in the Supplemental
12 Protective Order apply in full and with equal force to Walmart.

14 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

15 DATED this 7th day of November, 2023.

17 s/ Kara M. Mundy

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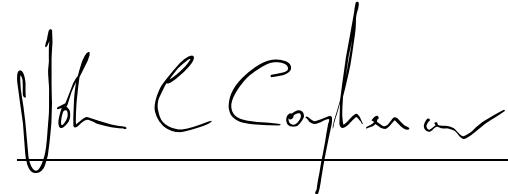
59 *Attorneys for Defendant Valve Corporation*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED
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IT IS FURTHER ORDERED that pursuant to Fed. R. Evid. 502(d), the production of
any documents in this proceeding shall not, for the purposes of this proceeding or any other
federal or state proceeding, constitute a waiver by the producing party or non-party of any
privilege applicable to those documents, including the attorney-client privilege, attorney work-
product protection, or any other privilege or protection recognized by law.

8 DATED this 9th day of November 2023.

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John C. Coughenour
UNITED STATES DISTRICT JUDGE